

Kolak, Shari

From: Kolak, Shari
Sent: Monday, March 10, 2014 4:20 PM
To: Wagaw, Wally (DEQ)
Subject: RE: West KL ESD - SRT Concerns

US EPA RECORDS CENTER REGION 5



477683

Wally,

In regard to the ESD, I am sending you our responses to SRT's concerns.

MDEQ comment: The state is supportive of the idea of drawing water from a useable aquifer, however, it is not convinced that there are two separate and distinct aquifers in CFW subdivision as suggested in the ESD. It has not been adequately demonstrated through hydrogeologic evaluations (pump tests, gw modeling etc..) that there would not be vertical migration of contaminants through geologic barriers.

EPA Response: I took out the phrase "the clay layer would minimize the upward migration of contaminant...(from the lower to upper aquifer) from the 3rd paragraph under Section III on page 5 of the ESD. I agree with SRT's comment that a pump test, gw modeling, etc. is needed to confirm there is no vertical migration of contaminants through the clay layer. The last sentence of the ESD now reads "The KLA Group has concluded it is very unlikely that the CFW residential wells would become impacted by the deep contaminated aquifer due to the presence of the thick clay layer", which I think is more accurate.

MDEQ Comment: SRT believes that EPA should be issuing a ROD Amendment (and hold a public meeting) not issuing an ESD. State concerned that RP's are making a decision for CFW residents and that residents don't know about the proposed IC change

EPA Response: I spoke to Heather at Kalamazoo County Health and Community Services about CFW residents desire to retain their wells for drinking water. Her impression is that they do want to retain their wells. A year or so ago, we also talked to Kalamazoo County and they too indicated the residents want to keep their wells. Given this, why is SRT concerned that the KLA Group is making a decision for the residents if all indications are that the residents want to keep their wells? Heather gave me names and phone numbers the CFW residents. I, or we, can call the residents if you think it'll help address SRT concern. Also, will be placing an ad in the local newspaper notifying the community of the ESD.

Please let me know your thoughts on my responses. Thanks, Shari

From: Wagaw, Wally (DEQ) [mailto:WAGAWW@michigan.gov]
Sent: Monday, March 03, 2014 1:27 PM
To: Kolak, Shari
Subject: RE: West KL ESD - SRT Concerns

Shari,

I am in the process of drafting a letter summarizing MDEQ's concerns and recommendations. I will have my management review the letter before I send it to you. But my plan is to get it out to you asap unless I am instructed otherwise.

In the meantime, as I suggested to you the other day, we can have a conference call with your management and mine to clarify issues.

See my comments below. I would delete the sentences I marked in red.

Thanks.

Wally

From: Kolak, Shari [<mailto:kolak.shari@epa.gov>]

Sent: Monday, March 03, 2014 1:38 PM

To: Wagaw, Wally (DEQ)

Subject: West KL ESD - SRT Concerns

Wally,

Are you going to send EPA a comment letter before the TAPS meeting with the RPs?

Also, I need to let my management know about the State's concerns with the ESD. I attempted to capture the things we talked about last. Please let me know if I accurately captured the SRT's concerns. If not, please edit/add to the bullets.

- SRT believes that EPA should be issuing a ROD Amendment (and hold a public meeting) not an ESD. State concerned that RP's are making a decision for CFW residents and that residents don't know about the proposed IC change.
- The state is supportive of the idea of drawing water from a useable aquifer, however, it is not convinced that there are two separate and distinct aquifers in CFW subdivision as suggested in the ESD. It has not been adequately demonstrated through hydrogeologic evaluations (pump tests, gw modeling etc..) that there would not be vertical migration of contaminants through geologic barriers.
- SRT concerned about the upward migration of contaminants from the lower contaminated aquifer into the upper clean aquifer and want the RPs to perform a pump test and groundwater modeling to verify there is no connection between the two aquifers. SRT concerned even though the RP's Hydrogeological Assessment shows the presence of a 20 foot thick clay layer separating the two aquifers and 2) there have been no detections of any contaminants in CFW wells since residential sampling began in 2009.
- State concerned about setting precedence.
- State asked RP's to give a presentation to their TAPS team (team of experts) on March 21st.

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